

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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**MEMO ENDORSED**

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

October 21, 2020

**By ECF**

Honorable Valerie Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
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**Re: *United States v. Martin Reyes, 20 Cr. 159 (VEC)***

Dear Judge Caproni:

I write with the consent of the Government and Pretrial Services to request permission for Martin Reyes to travel to West Orange, New Jersey on October 26, 2020 for a surgery on his cervical spine. The outpatient procedure will take place at the Mountain Surgery Center, and Mr. Reyes expects to return home that same day. I further request that Mr. Reyes be permitted to have his ankle monitor removed for the day of the surgery, in case he is required to undergo any X-rays or MRIs. The Government and Pretrial consent to this request as well.

On October 15, 2020, Mr. Reyes pleaded guilty to one count of narcotics conspiracy, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846. Mr. Reyes's Pretrial Officer, Ashley Cosme, reports that he has remained in full compliance with his bail conditions without any violations since the date of his release.

Application GRANTED.

Respectfully submitted,

SO ORDERED.

*Valerie Caproni*

10/22/2020

/s/ Ariel Werner  
Ariel Werner  
Assistant Federal Defender  
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HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

cc: Juliana Murray, Assistant U.S. Attorney

Ashley Cosme, U.S. Pretrial Services Officer